

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PRINCETON DIGITAL IMAGE )  
CORPORATION, )  
 )  
Plaintiff, )  
 ) C.A. No. 13-238-LPS  
v. )  
 ) **JURY TRIAL DEMANDED**  
 )  
DELL INC., )  
 )  
Defendant. )

**DEFENDANT DELL INC.'S MOTION TO DISMISS PLAINTIFF PRINCETON  
DIGITAL IMAGE CORPORATION'S COMPLAINT FOR PATENT INFRINGEMENT**

Defendant Dell Inc. respectfully moves this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss Plaintiff Princeton Digital Image Corporation's Complaint for Patent Infringement. Defendant relies on its Opening Brief in Support of its Motion to Dismiss, filed contemporaneously herewith.

Dated: July 12, 2013

/s/ Francis DiGiovanni

Francis DiGiovanni

NOVAK DRUCE CONNOLLY BOVE + QUIGG LLP

1007 North Orange Street, 9<sup>th</sup> Floor

Wilmington, DE 19801

Fax: 302.658.5614

Tel: 302.888.6316

frank.digiovanni@novakdruce.com

Of Counsel:  
Thomas M. Dunham  
J. Michael Woods  
WINSTON AND STRAWN LLP  
1700 K Street, N.W.  
Washington, DC 20006-3817  
Fax: 202.282.5100  
Tel: 202.282.5000  
tdunham@winston.com  
mwoods@winston.com

*Attorneys for Defendant Dell Inc.*

Monica M. Moussighi  
WINSTON & STRAWN LLP  
1111 Louisiana, 25<sup>th</sup> Floor  
Houston, TX 77002  
Tel: 713.651.2600  
mmoussighi@winston.com